



DATE: February 5, 1992

TO: Mary Gade

EPA Region 5 Records Ctr.



300926

FROM: Jim Park

SUBJECT: Briefing on issues that may arise in the meeting with the Chicago Port District as it relates to the 103rd and Doty Closure Plan

Issues: As best as we can determine the meeting with the Chicago Port District on February 6, 1992, concerning the closure plan at the 103rd and Doty solid waste refuse site developed by MWRDGC may focus on the following issues:

- 1) Golf Course development at site
- 2) Use of dredged material at site
- 3) Health related issues for sludge use at site

Background: MWRDGC received approval from the Agency to proceed with a closure plan at the 103rd and Doty solid waste refuse site previously operated by the City of Chicago as a "landfill". The closure plan basically involved placing sludge on the site, covering the sludge with a 2 foot layer of clay, placing sludge over the clay cap for establishment of vegetation and erosion control and utilizing the site as public open space or as a nursery. MWRDGC was to provide for runoff control, monitoring well data collection and reporting to the Agency. The site received minimal Agency involvement as MWRDGC had been submitting the quarterly monitoring well data and monthly sludge quantity and quality reports to the Agency. The site had been discussed briefly at various times and during annual Agency/MWRDGC meetings. The discussions mainly involved MWRDGC providing a status report on the site. MWRDGC had indicated that the site would probably be developed into a golf course with long term care to be undertaken by the Chicago Port District (CPD) who apparently owns the land. This plan was in line with the original intent of closing the site with vegetation establishment, public open use and maintenance by the public body. MWRDGC and the CPD have been involved with discussions on what type (and cost) of golf course to be built at the site. He have advised MWRDGC that we did not have any type of bond or agreement as to the future of the site. The local people are concerned about the site.

The Agency became involved with the site in 1989 as a result of sample collection resulting from a surface storm water discharge into adjacent waters. As a result of letters and meeting between MWRDGC and the Agency, MWRDGC constructed three storm water retention basins with connection to MWRDGC sewers for subsequent treatment of any storm water discharge from the site. MWRDGC reports to the Agency on a monthly basis as a result of this project.

The CPD is involved with the development of a marina in Lake Calumet. Part of the plan is to dredge approximately 450,000 cubic yards of sediment from Lake Calumet. The largest problem with this project is the disposal of all of the dredge material. Due to the adjacent locale of the 103rd and Doty site, CPD has inquired with MWRDGC as to them using this clay material as part of the clay cap for the closure project. The material is apparently adequate for the clay cap with respect to clay content but there may be some problems with the moisture content without partially dewatering the material. Both the CPD and MWRDGC have been told by the

Agency that the material could be used for the clay cap provided it met the MWRDGC clay specifications. Apparently CPD has requested that MWRDGC pay for this clay material. MWRDGC has found other clay sources for use as they did not wish to pay for the Lake Calumet dredging project. The Agency is awaiting the 404/401 permit application for this project.

Recommendations: The following recommendations are made with respect to the above issues: 1) A golf course can be developed at the site provided the integrity of the clay cap is protected from intrusion by any structures on the site or from any golf course features. The type of golf course is a local issue to be argued between MWRDGC and the CPD. 2) Dredged material from Lake Calumet can be used at the site for the clay cap provided it meets the clay content specifications by MWRDGC. MWRDGC should be allowed to choose their source of clay based on economics. The Agency should not direct them to any particular source. 3) There have been no health related issues concerning sludge use at public access sites. Sludge has been used at numerous public access sites such as parks, football fields, cemeteries, and farms, etc. with no known health related problems. MWRDGC provides proper treatment of sludge for these uses.

JBP:SAK:bst